

Exhibit 20

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
Charleston Division**

DEREK CLEMENTS, <i>et al.</i> ,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No. 2:22-cv-02069-RMG
)	
LLOYD J. AUSTIN, III, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF CADET SOPHIA GALDAMEZ

I, Sophia Galdamez, am a Cadet at the United States Coast Guard Academy.

On August 15th 2022 at 1510, I attended a meeting with CDR Casavant and Senior Chief Scott regarding an Administrative Remarks (Page 7) notice with the Entry Type of Performance and Discipline (P&D-41C). This Page 7 stated once again that “active duty and Coast Guard members are required to receive COVID-19 vaccination in accordance with the Food and Drug Administration’s approved labeling and guidance (“vaccine mandate”). Members may also choose to receive vaccines administered under the Food and Drug Administration’s Emergency Use Authorization.” It then goes on to state that “the Food and Drug Administration has recently issued and Emergency Use Authorization for the Novavax COVID-19 vaccine. Service members who complete the Novavax regime would be in compliance with the Coast Guard’s COVID-19 vaccine mandate.” This memo was signed by Capt. Michael A. Turdo on August 5th, 2022, and provided to me on August 15th, 2022. During this meeting, CDR Casavant informed me of the availability of the vaccine to Coast Guard members. On August 15th, 2022, at 1510 I also

received a memo from RADM Eric C. Jones (DCMS-DPR) stating that “After review and careful consideration of references (a), (b), (c), (d), (e), (f), (g), (h), (i) and (k), I am denying your appeal of disenrollment.” This memo was dated “Aug 11, 2022” and was provided to me on August 15th, 2022. During the meeting, I informed CDR Casavant on the filings made between my lawyers and the DOJ regarding the agreement to take no action until September 1st, 2022, to which I was informed that CDR would check with the Coast Guard Academy legal department. During the meeting CDR Casavant then told me to wait on the out-processing paperwork, but then a couple hours later while I was on OOD duty I was informed by Senior Chief Scott that there will be no pause in the out-processing and that I should actively be working on the out-processing checklist and get it done as soon as possible.

On August 17th, 2022, at 1300 I was informed by Senior Chief Scott that I would need to have the out-processing checklist done by 1200 Friday August 19, 2022, or I would face severe punishment from Cadet Division. When I reminded her of the September 1st agreement that was discussed during the meeting, I was yelled at by her for my questioning and was in front of others and threatened further with administrative action for not complying.

It is important to note that I turned in my religious accommodation memo on September 19th 2022 and did not receive a denial until March 13 2022. On May 5th 2022 I was issued my appeal denial. In all the meetings and conversations that occurred there was never any mention of disenrollment. It was not until June 13th 2022 that I would be issued official disenrollment papers from Rear Admiral William Kelly. I would only receive my appeal to my disenrollment on August 15th 2022. This would not only take away my opportunity to pursue my college education at the Coast Guard Academy, but this would result in me becoming behind in my academics

since it would not provide me with enough time to enroll in the 2022-2023 fall semester at another college.

The following is some of the harassment that I have received due to my vaccination status at the academy. On August 17 2021 during the Physical Fitness Exam I was continuously harassed and screamed at by athletic department staff at the academy because my mask was falling down during the exercising. It is important to note that the exam was taken outside and now only unvaccinated had to wear masks outside. Administrators were threatening to give me an automatic fail if my mask continued to fall during physical activity. That same day I would then be pulled aside by my volleyball coach Mark Thomas and told that Assistant Athletic Director Donna Koczajowski informed him that I embarrassed the volleyball team by not adhering to Coast Guard masking policy during the PFE and “put the Volleyball team and [myself] under a microscope.” He also informed me that a representative from the Athletic Department would come to all practices and games to perform surveillance on me to make sure that I was strictly adhering to the mask policy and that I would get severely punished if I did not adhere to it. My coach would also tell me that even though everyone was required to wear masks at practice and not everyone would wear them correctly, I was not given the same privilege and that I was responsible for always wearing them correctly or could face punishment. I was also told that this was not to be shared with others.

RADM Kelly chose to attend many of my PFE remediations, volleyball practices, and Volleyball games to taunt me. During an early morning retake of the PFE, he stayed for the duration of the test and watched me the whole time. After Volleyball games, he would approach me individually to taunt me and pressure me into getting vaccinated. Even one time coming up to me and whispering to me, “Wouldn’t it be nice to participate without a mask?”. After feeling

increasingly uncomfortable, I would continuously try to avoid RADM Kelly. However, he would try to attend my sports activities and approach me continuously.

Regarding the incidents of 11AUG2021 and 17AUG2021, there was a whistleblower complaint filed by my mom that was investigated by LTJG Anthony Lee and then later by CAPT Michael Ennis into harassment by RADM Kelly. I have reached out to both regarding the resolution, LTJG Lee is not knowledgeable about the final decisions and CAPT Ennis is not sure what the outcome of the case was.

During the week of 17AUG2021, I was also informed through my Academic Advisor that all my teachers were informed of my vaccination status, and I would be held accountable if I did not maintain at least 6 ft of social distance between my classmates and me at all times in the classroom. I would also be required to sit in the back of the classroom. Some teachers even would tell some unvaccinated cadets that to reduce contact tracing and to limit breaking social distancing protocols, they could not participate in group projects and work, and some teachers would put up plexiglass barriers for students to sit behind. When I brought this up to cadet division, they claimed they never gave this order and never knew these things were occurring. While the teachers were saying these protocols were pushed by cadet division.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17th 2022.

A handwritten signature in black ink, appearing to read 'Sophia Galdamez', with a long, sweeping horizontal line extending to the right.

Sophia Galdamez